

Thomas L. Gambaro
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PATENT ENFORCEMENT COMPANY
MOTIONLESS KEYBOARD COMPANY
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FILED 10 MAY 10 14:57 USDC-ORP

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

FLIR SYSTEMS, INC., an Oregon
corporation,

Plaintiff,

v.

PATENT ENFORCEMENT COMPANY,
an Oregon company

Previously:

THOMAS L. GAMBARO, an individual;
and **MOTIONLESS KEYBOARD**
COMPANY, an Oregon corporation

Defendants.

Case No. CV 10-0231-BR

**DEFENDANT OPPOSITION TO
MOTION TO STRIKE ANSWERS**

DEMAND FOR JURY TRIAL

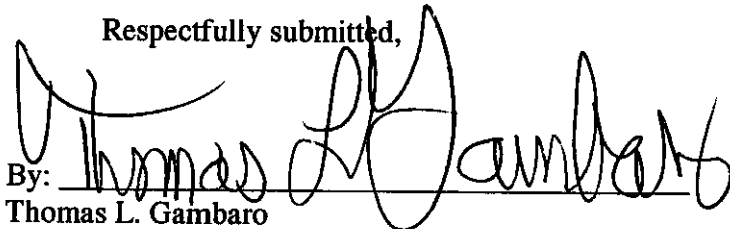
DEFENDANT OPPOSITION TO MOTION TO STRIKE

In consideration for PATENT ENFORCEMENT COMPANY pending MOTION 01, MOTION 02, and MOTION 03 the inventor of U.S. Patent No. 5,332,322 will answer and oppose the FLIR MOTION TO STRIKE DEFENDANT MOTIONLESS KEYBOARD COMPANY'S ANSWER, DEFENSES AND COUNTERCLAIM(S).

The primary reason given during a conference with the opposing party attorney for the motion to strike answers was that THOMAS L. GAMBARO, an individual is not an attorney and therefore may not appear or answer for MOTIONLESS KEYBOARD COMPANY, an Oregon corporation. I explained to the attorney from SCHWABE, WILLIAMSON, & WYATT that U.S. Patent No. 5,332,322 was no longer assigned to MOTIONLESS KEYBOARD COMPANY but in the process of being assigned to PATENT ENFORCEMENT COMPANY and that the date on U.S. Patent and Trademark Office Form 1595 had been filed without a date and that the PTO had approved the assignment pending the return of the form correctly filled out. I said the form was in the U.S. Mail and that the assignment would be registered soon. I further clarified the fact that the PATENT ENFORCEMENT COMPANY was registered as a company not a corporation and that the reason for the MOTION TO STRIKE DEFENDANT MOTIONLESS KEYBOARD COMPANY'S ANSWER would not exist much longer. During the conversation the attorney I spoke with checked the registration with the State of Oregon Central Business Registry to confirm my statements and indicated that to preserve their clients rights that the MOTION TO STRIKE MOTIONLESS KEYBOARD COMPANY'S ANSWERS would still be filed. This was acknowledged.

Dated: May 10, 2010

Respectfully submitted,

By: 

Thomas L. Gambaro

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 8, 2010, a true copy of the foregoing **DEFENDANT OPPOSITION TO MOTION TO STRIKE ANSWERS** was served to the following counsel by hand delivery, electronic filing via e-mail with electronic signature and first class mail:

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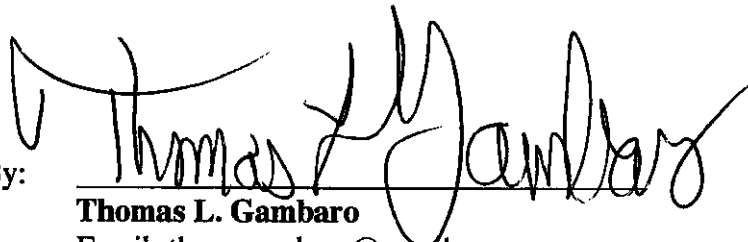
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Respectfully submitted,

May 10, 2010

By:



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